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Attorney for Defendant
Francisco Cornejo Quezada

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRACISCO CORNEJO QUEZADA,
SHAWN ERIC MORALES, Sr., and
RENEE MICHELE HERMANN

Defendants.

CASE NO. 2:24-cr-00304-JAM

**THIRD STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME**

DATE: July 15, 2025 (requested date)

TIME: 9:00 a.m.

COURT: Hon. John A. Mendez, Senior District Court
Judge

The United States of America through its undersigned counsel, Emily G. Sauvageau, Assistant United States Attorney, together with counsel for defendant Francisco Cornejo Quezada, John R. Manning, Esq., counsel for defendant Shawn Eric Morales, Mark J. Reichel, Esq., and, counsel for defendant Renee Michele Hermann, Michael D. Long Esq., hereby stipulate the following:

1. By previous order, this matter was set for status conference on July 10, 2025, at 9:30 a.m., before Chief District Court Judge Troy L. Nunley. Time was excluded between April 24, 2025 and July 10, 2025.
2. On, or about, April 21, 2025, Chief District Court Judge Troy L. Nunley reassigned the matter to Senior District Court Judge John A. Mendez (ECF 64) and the previously set status conference (July 10, 2025) before Chief District Court Judge Troy L. Nunley was vacated
3. By this stipulation, the parties now move to continue the matter until **July 15, 2025, at 9:00**

1 **a.m.**, and to exclude time between April 24, 2025, and July 15, 2025, under 18 U.S.C.

2 § 3161(h)(7)(A), B(iv) [Local Code T4] to allow defense counsel time to prepare. The parties
3 agree and stipulate, and request the Court find the following:

4 a) The government has produced discovery in this matter, to date, consisting of 583
5 pages of reports and 301 native files (containing audio recordings, text messaging and excel
6 files). The government has further indicated additional discovery is forthcoming.

7 b) Counsel for defendants have met with their clients to discuss their respective
8 cases. Defense counsel desire additional time to conduct investigation into the charges, the
9 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
10 will need additional time to discuss potential resolutions with their clients, prepare pretrial
11 motions, and otherwise prepare for trial.

12 c) Counsel for defendants believe that failure to grant the above-requested
13 continuance would deny them the reasonable time necessary for effective preparation, taking into
14 account the exercise of due diligence.

15 d) The government does not object to the continuance.

16 e) Based on the above-stated findings, the ends of justice served by continuing the
17 case as requested outweigh the interest of the public and the defendant in a trial within the
18 original date prescribed by the Speedy Trial Act.

19 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
20 et seq., within which trial must commence, the time period of April 24, 2025 to July 15,
21 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
22 T4] because it results from a continuance granted by the Court at defendant's request on the basis
23 of the Court's finding that the ends of justice served by taking such action outweigh the best
24 interest of the public and the defendant in a speedy trial.

25 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
26 Speedy Trial Act dictate that additional time periods are excludable from the period within which
27 a trial must commence.

28 IT IS SO STIPULATED.

1 Dated: April 23, 2025

/s/ JOHN R. MANNING

JOHN R. MANNING

Counsel for Defendant

FRANCISCO CORNEJO

QUEZADA

5 Dated: April 23, 2025

/s/ MARK J. REICHEL

MARK J. REICHEL

Counsel for Defendant

SHAWN ERIC MORALES, Sr.

8 Dated: April 23, 2025

/s/ MICHAEL D. LONG

MICHAEL D. LONG

Counsel for Defendant

RENEE MICHELE HERMANN

11 Dated: April 23, 2025

MICHELE BECKWITH

Acting United States Attorney

/s/ EMILY G. SAUVAGEAU

EMILY G. SAUVAGEAU

Assistant United States Attorney

17 FINDINGS AND ORDER

18 The Court, having received, read, and considered the stipulation of the parties, and good
19 cause appearing therefrom, **ADOPTS** the stipulation of the parties in its entirety as its order.

20 IT IS SO FOUND AND ORDERED.

22 Dated: April 24, 2025

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

SENIOR UNITED STATES DISTRICT JUDGE